

EXHIBIT “A”

SUMMARY OF ALLEGATIONS AGAINST SALEH AL RAJHI

This chart collects all references to Saleh Al Rajhi that are scattered through the following filings:

- THIRD AM. CONSOL. MASTER COMPL., *Ashton v. Al Qaeda Islamic Army* [“*Ashton*”], (02-CV-6977);
- COMPL., *Barrera v. Al Qaeda Islamic Army* [“*Barrera*”], (03-CV-7036);
- AM. COMPL., *Burnett v. Al Baraka Inv. & Dev. Corp.*, (03-CV-5738) & THIRD AM. COMPL., *Burnett v. Al Baraka Inv. & Dev. Corp.*, (03-CV-9849) [hereinafter, collectively, “*Burnett*”].
- FIRST AM. COMPL., *Continental Cas. Co. v. Al Qaeda* [“*Cont'l Cas.*”], (04-CV-5970);
- COMPL., *Euro Brokers Inc. v. Al Baraka Inv. & Dev. Corp.* [“*Euro Brokers*”], (04-CV-7279);
- FIRST AM. COMPL., *Federal Ins. v. Al Qaida* [“*Fed. Ins.*”], (03-CV-6978);
- FIRST AM. COMPL., *New York Marine & Gen. Ins. Co. v. Al Qaida* [“*NYMAGIC*”], (04-CV-6105);
- CONSOL. FIRST AM. MASTER COMPL., *Salvo v. Al Qaeda Islamic Army* [“*Salvo*”], (03-CV-5071);
- AM. COMPL., *Tremsky v. Osama bin Laden* [“*Tremsky*”], (02-CV-7300);
- COMPL., *World Trade Ctr. Props. LLC v. Al Baraka Inv. & Dev. Corp.* [“*WTCP*”], (04-CV-7280);
- RICO STATEMENT APPLICABLE TO DEFNS. SULAIMAN ABDULAZIZ AL RAJHI, ABDULLAH SULAIMAN AL RAJHI & SALEH ABDULAZIZ AL RAJHI, *Cont'l Cas.* [“*Cont'l Cas. RICO*”];
- RICO STATEMENT APPLICABLE TO SULAIMAN BIN ABDUL AZIZ AL RAJHI, SALEH ABDUL AZIZ AL RAJHI, ABDULLAH SULAIMAN AL-RAJHI & KHALID SULAIMAN AL-RAJHI, *Euro Brokers* [“*Euro Brokers RICO*”];
- AMENDED RICO STATEMENT APPLICABLE TO SULEIMAN ABDEL AZIZ AL RAJHI, SALEH ABDULAZIZ AL-RAJHI, & ABDULLAH SULEIMAN AL-RAJHI, *Fed. Ins.* [“*Fed. Ins. RICO*”]; and
- RICO STATEMENT APPLICABLE TO SULAIMAN BIN ABDUL AZIZ AL RAJHI, SALEH ABDUL AZIZ AL RAJHI, ABDULLAH SULAIMAN AL-RAJHI & KHALID SULAIMAN AL-RAJHI, *WTCP* [“*WTCP RICO*”].

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| 1 | <i>Ashton</i> ¶ 559; <i>Barrera</i> ¶ 563; <i>accord Burnett</i> ¶ 84; <i>Cont'l Cas.</i> ¶ 357; <i>Salvo</i> ¶ 355; <i>Tremsky</i> ¶ 51; <i>WTCP</i> ¶ 131. | “Officially founded in 1987, Defendant AL-RAJHI BANKING & INVESTMENT CORPORATION, (or ‘AL-RAJHI BANK’) has a network of nearly 400 branch offices throughout Saudi Arabia and manages seventeen subsidiaries across the world. . . . Defendant SALEH ABDULLAHZIZ AL RAJHI is the Chairman.” | There is “no basis for a bank’s liability for injuries funded by money passing through it on routine banking business” and Plaintiffs have failed to state a claim against the Al Rajhi Bank. <i>In re Sept. 11th</i> , 349 F. Supp. 2d at 833. An officer cannot be liable for conduct for which the Bank cannot be liable. |
| 2 | <i>WTCP</i> ¶ 214 | “Al Rajhi [Bank] is majority owned and controlled by the al-Rajhi Family (‘al-Rajhi Family’) who derive from it much of their immense wealth. Family members also make up a majority of its board of directors and executive committee. . . . Saleh Abdul Aziz al-Rajhi, has the second largest holding and is also a director.” | Allegations based on family membership fail. <i>In re Sept. 11th</i> , 349 F. Supp. 2d at 812. Conclusory allegations are insufficient to state a claim. <i>Id.</i> at 832-33. There is “no basis for a bank’s liability for injuries funded by money passing through it on routine banking business” and Plaintiffs have failed to state a |

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| | | | claim against the Al Rajhi Bank. <i>Id.</i> at 833. An officer cannot be liable for conduct for which the Bank cannot be liable. |
| 3 | <i>Ashton</i> ¶ 561; <i>Barrera</i> ¶ 565; <i>accord Burnett</i> ¶ 86; <i>Cont'l Cas.</i> ¶ 359; <i>Salvo</i> ¶ 357; <i>Tremsky</i> ¶ 53; <i>WTCP</i> ¶¶ 133, 214. | “SALEH ABDULLAHZIZ AL RAJHI has been closely linked to OSAMA BIN LADEN’s personal secretary and convicted terrorist, WADIH EL HAGE. When the Kenyan house of OSAMA BIN LADEN’s personal secretary, WADIH EL HAGE, was raided in 1997, information regarding SALEH ABDULLAHZIZ AL RAJHI was discovered.” | Conclusory allegations are insufficient to state a claim. <i>In re Sept.</i> 11th, 349 F. Supp. 2d at 832-33. |
| 4 | <i>Ashton</i> ¶ 562; <i>Barrera</i> ¶ 566; <i>accord Burnett</i> ¶ 87; <i>Cont'l Cas.</i> ¶ 360; <i>Salvo</i> ¶ 358; <i>Tremsky</i> ¶ 54; <i>WTCP</i> ¶ 134. | “Co-conspirators, agents, aiders and abettors of the AL RAJHI banking scheme to fund or otherwise materially support terrorism include: [numerous defendants, including Saleh Al Rajhi]. All of these Defendants do business in and have a significant business presence in the United States, including but not limited to, through AL WATANIA POULTRY, one of the World’s largest poultry businesses, and through Defendants MAR-JAC POULTRY, INC., MAR-JAC INVESTMENTS, INC. and PIEDMONT POULTRY. They are also material sponsors of international terrorism.” | Conclusory allegations are insufficient to state a claim. <i>In re Sept.</i> 11th, 349 F. Supp. 2d at 832-33. Conclusory allegations cannot be relied upon to establish a <i>prima facie</i> case for personal jurisdiction. <i>Id.</i> at 804. |
| 5 | <i>Fed. Ins.</i> ¶ 66; <i>accord NYMAGIC</i> ¶ 45. | “[Numerous defendants, including Saleh Al Rajhi,] have aided and abetted, conspired with, and provided material support and resources to, defendant al Qaida and/or affiliated FTOs, associations, organizations or persons, as described herein.” | Conclusory allegations are insufficient to state a claim. <i>In re Sept.</i> 11th, 349 F. Supp. 2d at 832-33. |
| 6 | <i>Euro Brokers</i> RICO ¶ 5(b) table; <i>accord Cont'l Cas.</i> RICO ¶ 5(b); <i>Fed. Ins.</i> RICO ¶ 5(b) table; <i>WTCP</i> RICO ¶ 5(b) table. | “[Numerous defendants, including Saleh Al Rajhi,] conspired to support terrorism and to obfuscate the roles of the various participants and conspirators in Radical Muslim Terrorism, which conspiracy culminated in the September 11, 2001 Attacks.” | Conclusory allegations are insufficient to state a claim. <i>In re Sept.</i> 11th, 349 F. Supp. 2d at 832-33. |
| 7 | <i>Euro Brokers</i> RICO ¶ 5(b) table; <i>accord Cont'l Cas.</i> RICO ¶ 5(b); <i>Fed. Ins.</i> RICO ¶ 5(b) table; <i>WTCP</i> RICO ¶ 5(b) table. | “[Numerous defendants, including Saleh Al Rajhi,] used banking and financial operations to knowingly and intentionally provide financial services and materially support to al Qaeda and its members, as well as organizations which it knew were providing material support to the Enterprise.” | Conclusory allegations are insufficient to state a claim. <i>In re Sept.</i> 11th, 349 F. Supp. 2d at 832-33. |
| 8 | <i>Euro Brokers</i> RICO ¶ 5(b) table; <i>accord Cont'l Cas.</i> RICO ¶ 5(b); <i>Fed. Ins.</i> RICO ¶ 5(b) table; <i>WTCP</i> RICO ¶ 5(b) table. | “[Numerous defendants, including Saleh Al Rajhi,] undertook the above-named actions as part of a conspiracy to commit murder and arson, in that they knew that the Enterprise in which they were participating, Radical Muslim Terrorism, planned to and would commit an act of deadly aggression against the United States in the near future, using the resources and support it supplied.” | Conclusory allegations are insufficient to state a claim. <i>In re Sept.</i> 11th, 349 F. Supp. 2d at 832-33. |
| 9 | <i>Euro Brokers</i> RICO ¶ 5(b) table; <i>accord</i> | “[Numerous defendants, including Saleh Al Rajhi,] agreed to form and associate itself with the | Conclusory allegations are insufficient to state |

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| | <i>Cont'l Cas.</i> RICO ¶ 5(b); <i>Fed. Ins.</i> RICO ¶ 5(b) table; <i>WTCP RICO</i> ¶ 5(b) table. | Enterprise and agreed to commit more than two predicate acts, <i>i.e.</i> , multiple acts of murder and arson, in furtherance of a pattern of racketeering activity in connection with the Enterprise.” | a claim. <i>In re Sept. 11th</i> , 349 F. Supp. 2d at 832-33. |
| 10 | <i>Cont'l Cas.</i> RICO ¶ 5(c). | “[Numerous defendants, including Saleh Al Rajhi,] utilized interstate and international faxes, telephones, wire transfers and transmissions, and the United States and international mails to facilitate, provide financial and material support and provide substantial assistance to Al Qaeda. The financial support and assistance provided to al Qaeda by [numerous defendants, including Saleh Al Rajhi,] assisted the business and financial transactions in which al Qaeda engaged to further its operations and purposes. Al Qaeda relied upon [numerous defendants, including Saleh Al Rajhi], among others, to generate material support to continue its terrorist operations and to conceal the nature and extent of financial assistance provided to al Qaeda.” | Conclusory allegations are insufficient to state a claim. <i>In re Sept. 11th</i> , 349 F. Supp. 2d at 832-33. |
| 11 | <i>Euro Brokers</i> RICO ¶ 5(f); <i>accord Cont'l Cas.</i> RICO ¶ 5(f) & 6(f); <i>Fed. Ins.</i> RICO ¶ 5(f); <i>WTCP RICO</i> ¶ 5(f). | “[Numerous defendants, including Saleh Al Rajhi,] consistently, evenly [sic] constantly, laundered money, filed false tax returns, and otherwise impeded and impaired the administration of the tax laws as part of their scheme to conduit money to terrorists, and yet obfuscates their support of Radical Muslim Terrorism. The SAAR Network Entities . . . controlled by these defendants routinely moved around millions of dollars between them, with no innocent explanation for the layers of transactions taking place other than to obfuscate the fact that this money was going through these companies to offshore, untraceable banks on the Isle of Man, the Bahamas, and other locations, ultimately to support the Enterprise. [Numerous defendants, including Saleh Al Rajhi,] directed funds through a series of other entities over which they had influence until those funds ultimately reached a shell company in the Isle of Man, where they could no longer be tracked by federal authorities. These transactions bear all of the hallmarks of money laundering in support of terrorism. Such money laundering, the filing of false tax returns, and tax evasion were all in furtherance of a conspiracy to commit murder and arson which culminated in the September 11, 2001 Attacks.” | Conclusory allegations are insufficient to state a claim. <i>In re Sept. 11th</i> , 349 F. Supp. 2d at 832-33. |
| 12 | <i>Euro Brokers</i> RICO ¶ 5(g); <i>accord Cont'l Cas.</i> RICO ¶ 5(g); <i>Fed. Ins.</i> RICO ¶ 5(g); <i>WTCP RICO</i> ¶ 5(g). | “The predicate acts relate to each other . . . as part of a common plan because each act of money laundering and tax evasion allowed [numerous defendants, including Saleh Al Rajhi,] to surreptitiously provide funds to terrorist organizations, including al Qaeda, which conspiracy culminated in the September 11, 2001 Attacks.” | Conclusory allegations are insufficient to state a claim. <i>In re Sept. 11th</i> , 349 F. Supp. 2d at 832-33. |
| 13 | <i>Euro Brokers</i> RICO ¶ 6(b); <i>accord</i> | “[Numerous defendants, including Saleh Al Rajhi,] fit neatly into [the Al Qaeda] framework by | Conclusory allegations are insufficient to state |

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| | <i>Cont'l Cas.</i> RICO ¶ 6(b); <i>Fed. Ins.</i> RICO ¶ 6(b); <i>WTCP RICO</i> ¶ 6(b). | facilitating the transfer of money for and providing funding to and otherwise providing material support for the members of the Enterprise who engaged in the Attack by engaging in a course of conduct that including money laundering and tax evasion. . . . Al Qaeda relies upon a global network of banks, financial institutions and charities, including the SAAR Network Entities associated with [numerous defendants, including Saleh Al Rajhi,] and illegal activities (including narcotics trafficking) to generate material support to continue its terrorist operations.” | a claim. <i>In re Sept. 11th</i> , 349 F. Supp. 2d at 832-33. |
| 14 | <i>Euro Brokers</i> RICO ¶ 6(d); <i>accord Cont'l Cas.</i> RICO ¶ 6(d); <i>Fed. Ins.</i> RICO ¶ 6(d); <i>WTCP RICO</i> ¶ 6(d). | “[Numerous defendants, including Saleh Al Rajhi,] is associated with the Enterprise.” | Conclusory allegations are insufficient to state a claim. <i>In re Sept. 11th</i> , 349 F. Supp. 2d at 832-33. |
| 15 | <i>Euro Brokers</i> RICO ¶ 6(e); <i>accord Cont'l Cas.</i> RICO ¶ 6(e); <i>Fed. Ins.</i> RICO ¶ 6(e); <i>WTCP RICO</i> ¶ 6(e). | “[Numerous defendants, including Saleh Al Rajhi,] is a member of the Enterprise, and is separate and distinct from the Enterprise.” | Conclusory allegations are insufficient to state a claim. <i>In re Sept. 11th</i> , 349 F. Supp. 2d at 832-33. |
| 16 | <i>Euro Brokers</i> RICO ¶ 6(f); <i>accord Fed. Ins.</i> RICO ¶ 6(f); <i>WTCP RICO</i> 6(f). | “[Numerous defendants, including Saleh Al Rajhi,] intended to further the Attack and adopted the goal of furthering and/or facilitating that criminal endeavor, which criminal activity culminated in the September 11, 2001 Attacks.” | Conclusory allegations are insufficient to state a claim. <i>In re Sept. 11th</i> , 349 F. Supp. 2d at 832-33. |
| 17 | <i>Euro Brokers</i> RICO ¶ 7; <i>accord Cont'l Cas.</i> RICO ¶ 7; <i>Fed. Ins.</i> RICO ¶ 7; <i>WTCP RICO</i> ¶ 7. | “The pattern of racketeering activity conducted by [numerous defendants, including Saleh Al Rajhi,] is separate from the existence of al Qaeda and Radical Muslim Terrorism, but was a necessary component to the September 11, 2001 Attacks.” | Conclusory allegations are insufficient to state a claim. <i>In re Sept. 11th</i> , 349 F. Supp. 2d at 832-33. |
| 18 | <i>Euro Brokers</i> RICO ¶ 8; <i>accord Cont'l Cas.</i> RICO ¶ 8; <i>Fed. Ins.</i> RICO ¶ 8; <i>WTCP RICO</i> ¶ 8. | “[T]he racketeering activity conducted by [numerous defendants, including Saleh Al Rajhi,] furthers and facilitates that international terrorist and criminal activity, which culminated in the September 11, 2001 Attacks.” | Conclusory allegations are insufficient to state a claim. <i>In re Sept. 11th</i> , 349 F. Supp. 2d at 832-33. |
| 19 | <i>Euro Brokers</i> RICO ¶ 10; <i>accord Cont'l Cas.</i> RICO ¶ 10; <i>Fed. Ins.</i> RICO ¶ 10; <i>WTCP RICO</i> ¶ 10. | “The Enterprise and the racketeering activities conducted by [numerous defendants, including Saleh Al Rajhi,] relies heavily on the American interstate system of commerce for banking, financing, supplies, communications, and virtually all essential commercial functions, and in that matter affects interstate commerce.” | Conclusory allegations are insufficient to state a claim. <i>In re Sept. 11th</i> , 349 F. Supp. 2d at 832-33. |
| 20 | <i>Euro Brokers</i> RICO ¶ 14; <i>accord Cont'l Cas.</i> RICO ¶ 14; <i>Fed. Ins.</i> RICO ¶ 14; <i>WTCP RICO</i> ¶ 14. | “[Numerous defendants, including Saleh Al Rajhi,] laundered funds from Islamic charities and financial institutions, including the so-called charities and corporations, and facilitated the transfer of money through unwitting and unwitting institutions. . . . The camps were able to operate only because of the worldwide network of recruiters, travel facilitators, and document forgers who vetted recruits and helped them get in and out of Afghanistan in preparation for | Conclusory allegations are insufficient to state a claim. <i>In re Sept. 11th</i> , 349 F. Supp. 2d at 832-33. |

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| | | <p>the September 11, 2001 Attacks. None of this would have been possible without the funds and sponsorship supplied by participants and conspirators including [numerous defendants, including Saleh Al Rajhi]. Indeed, the Enterprise would not have been successful without the enthusiastic participation of all of the conspirators, including [numerous defendants, including Saleh Al Rajhi]. In order to identify individuals willing, able, and trained to carry out the September 11, 2001 Attacks, al Qaeda needed to select from a vast pool of recruits and trainees, which pool would not have been available to it without the assistance provided by [numerous defendants, including Saleh Al Rajhi]. [Numerous defendants, including Saleh Al Rajhi], with knowledge and intent, agreed to the overall objectives of the enterprise or conspiracy, and agreed to commit at least two predicate acts and all agreed to participate in the conspiracy, either expressly or impliedly. [Numerous defendants, including Saleh Al Rajhi], with knowledge and intent, agreed to and did aid and abet all of the above illegal activities, RICO predicate acts, and RICO violations.”</p> | |
| 21 | <i>Cont'l Cas.</i> RICO ¶ 16 | <p>“[Numerous defendants’, including Saleh Al Rajhi,] uninterrupted financial and material support of terrorism, mail fraud, wire fraud, money laundering, and substantial assistance, enabled the Enterprise to plan, orchestrate, and carry out the Attack that injured plaintiffs. Therefore, the conduct of [numerous defendants, including Saleh Al Rajhi,] proximately resulted in the Attack. Plaintiffs suffered injury to their property by reason of the above conduct of [numerous defendants, including Saleh Al Rajhi].”</p> | <p>Conclusory allegations are insufficient to state a claim. <i>In re Sept. 11th</i>, 349 F. Supp. 2d at 832-33.</p> |
| 22 | <i>Euro Brokers</i> RICO Ex. A; accord <i>Cont'l Cas.</i> RICO Ex. A at 10-11; <i>Fed. Ins.</i> RICO Ex. A at 13; <i>WTCP</i> RICO Ex. A. | <p>“Saleh Abdulaziz Al-Rajhi, eldest brother of Sulaiman, has been Chairman of the Al-Rajhi Banking and Investment Corporation, and is inextricably tied to the actions of Al Rajhi Banking and Investment Corporation as alleged above and in previous court filings. Furthermore, Saleh Abdulaziz al-Rajhi is personally linked to Wadi el-Hage, Osama bin Laden’s personal secretary. (Saleh’s phone number found in Wadi’s phone book upon his arrest.).”</p> | <p>There is “no basis for a bank’s liability for injuries funded by money passing through it on routine banking business” and Plaintiffs have failed to state a claim against the Al Rajhi Bank. <i>In re Sept. 11th</i>, 349 F. Supp. 2d at 833. An officer cannot be liable for conduct for which the Bank cannot be liable. Conclusory allegations are insufficient to state a claim. <i>Id.</i> at 832-33.</p> |